



Isle Royale NATIONAL PARK





Rock Harbor Lighthouse (NPS photo); Cover photo: Rock of Ages Lighthouse (NPS photo).

INTRODUCTION

Public scoping is an early phase of planning devoted to engaging the public in determining the future for the project area. Public involvement is essential to planning for the cultural resources management plan at Isle Royale National Park. With that in mind, Isle Royale National Park initiated a public scoping period with the release of a Cultural Resources Management Plan (CRMP) Preliminary Alternatives newsletter on October 28, 2013. The scoping period concluded on December 4, 2013. During this period, the National Park Service gathered input from the public through various means to help identify the issues that this plan should address. This document describes these public involvement efforts and summarizes the input received.

PROJECT BACKGROUND

The CRMP tiers from the 1998 general management plan to develop a comprehensive strategy for managing cultural resources that would ensure consistent and appropriate identification, preservation treatment, and interpretation of these resources. The enabling legislation for Isle Royale National Park and the National Historic Preservation Act (16 U.S.C. 470 et seq.), as well as the Wilderness Act (16 U.S.C. 1131–36), and other laws and policies, will frame the decision making for the CRMP. The CRMP will establish the overall management direction for the park's cultural resources over the next 15–20 years and will integrate cultural resource management goals and objectives within the context of other key park resources and values.

Cultural resources include archeological resources, cultural landscapes, ethnographic resources, museum objects, and historic structures. Some of these resources are eligible for inclusion in the National Register of Historic Places. A large portion of the park is water and has many submerged cultural resources, from shipwrecks to the artifacts from previous inhabitants. All but a small fraction of the park landmass is wilderness (this wilderness does not extend into the water), and a mix of cultural sites can be found in wilderness and nonwilderness areas. The CRMP will prescribe desired resource conditions and visitor experiences to be achieved and maintained for cultural resources based on the park purpose and significance, special mandates, the body of NPS and historic preservation laws and policies, resource condition analysis, and by taking into consideration the range of public expectations and concerns. The CRMP will also outline a variety of resource management activities, visitor activities, and developments with regard to cultural resources that would be appropriate at Isle Royale National Park in the future. A full range of reasonable alternatives for the management, treatment, and interpretation of cultural resources will be developed through this planning process and will include, at minimum, a no-action and a preferred alternative. The potential environmental effects of each alternative will be evaluated.

A notice of intent to complete the cultural resources management plan / environmental impact statement was published in the *Federal Register* on March 15, 2013.





Minong Lodge Cabin, Tobin Harbor (NPS photo).

SCOPING OVERVIEW

Isle Royale National Park is treasured by the general public and many other entities affiliated with the park. Therefore, during the public scoping phase for the CRMP, NPS staff made every effort to engage interested or affected agencies, organizations, members of the public, and recognized tribes.

NOTIFYING THE PUBLIC

To ensure a high degree of transparency and involvement with the public, the National Park Service announced opportunities to participate in the planning process in many different ways. A scoping newsletter including a comment card was sent in October 2013 via direct mail and email to park visitors, park neighbors, and other interested parties. In addition, the National Park Service sent formal consultation letters to tribes and regulatory agencies. These mailings were meant to update the public on the project, announce opportunities for involvement, and initiate the formal public scoping period. A press release was also issued, and public meetings were advertised via local media outlets and social media tools. Comments were also solicited online at the National Park Service Planning, Environment and Public Comment (PEPC) website (<http://parkplanning.nps.gov/ISROcrmp>), and comment cards were made available at public meetings and at the park's visitor center. The public was invited to submit comments on the preliminary alternatives through December 4, 2013.

Scoping Meetings

The National Park Service conducted several scoping meetings in November 2013 to gather the public's ideas on the preliminary draft alternative concepts.

Four public meetings were held in November 2013 to promote a high level of interaction between the public and planning team personnel: Houghton, Michigan, on November 12; Chelsea, Michigan, on November 14; St. Paul, Minnesota, on November 19; and Duluth, Minnesota, on November 20. NPS staff set up listening stations at the meetings where the background, issues, and preliminary draft alternative concepts for this project could be discussed in depth. A PowerPoint presentation, maps, posters, and handouts presented this material in a visual format and supported discussions. These materials are available online at the PEPC website for the park.

Attendance at these public meetings consisted mostly of members from the local communities of the four meeting locations, as well as some from outlying areas in the region. Altogether, 42 people, 24 people, 24 people, and 33 people respectively attended the four public meetings for a total of 123 people.

Additionally, a meeting of consulting parties related to National Historic Preservation Act section 106 was held in Duluth, Minnesota, on November 21. Attendees at this meeting included NPS staff, representatives from the Isle Royale Families and Friends Association, Michigan State Historic Preservation Office, North Shore Commercial Fishing Museum, Michigan Historic Preservation Network, and the National Trust for Historic Preservation. Notes from this meeting are available online on the Isle Royale National Park PEPC website. At a later date, NPS staff will also attend a meeting with the tribes traditionally associated with Isle Royale and their comments and concerns will be considered as part of this public scoping process.



Public Comments

To help solicit comments from the public, the planning team developed five topic questions that were included on the comment card:

- 1 What do you like about the preliminary draft alternative concepts presented in this newsletter? Please describe anything you do not like about the concepts.
- 2 Is there one alternative concept that you prefer more than the others? If so, please tell us why.
- 3 Are there ideas or concepts we have missed or overlooked? Is there a different alternative concept you would like to see? If so, please describe it and tell us why you believe it is important.
- 4 Are there specific resources or sites you would like to see preserved in each of the draft alternative concepts? If so, please tell us what they are and why they should be preserved.
- 5 Please share any additional comments or suggestions for us to consider as we develop draft alternatives.

Comment analysis was initiated on December 10 and any correspondence received after that date was retained for consideration but was not analyzed.

During the public comment period, 143 pieces of correspondence were entered into the PEPC system, either through direct entry by commenter or uploading hard copy letters or electronic correspondence. Attendees at public scoping meetings also offered a number of valuable comments, which NPS staff recorded by hand during the meetings and later incorporated into the comment analysis. While private individuals submitted most of the correspondence, multiple members or representatives of conservation organizations, recreational organizations, and historical organizations also submitted correspondence. The majority of commenters were from the United States, although one comment was received from Canada. Twenty-nine percent of the commenters were from Minnesota, 26% from Michigan, and 16% from Wisconsin, and the remaining from various states throughout the United States or the respondent did not identify a state. Organizations represented by comments include the following (these organizations are those commenters who self-identified as official representatives for the organization, or were discerned to be official representatives from the content of their comments):

- Amicus Adventure Sailing
- Apostle Islands Historic Preservation Conservancy
- Copper Country Ancient Sites Conservancy
- Good Old Boat Magazine
- Historic Fort Wayne Coalition, Detroit
- Isle Royale & Keweenaw Parks Association
- Isle Royale Families and Friends Association
- Johns Hotel Historical Point Association
- National Parks Conservation Association
- National Trust for Historic Preservation
- North Shore Commercial Fishing Museum
- Wilderness Watch



Pond net fishing, circa 1920s (Farmer Collection - ISRO archives).



WHAT WE HEARD

During the public scoping period, the National Park Service received many valuable comments that will help guide development of the CRMP. The summary below synthesizes comments submitted online, in hard copy, and at public scoping meetings. All comments are tabulated by topic on subsequent pages of this report, in no particular order. Although most comments responded to the five topics mentioned above, some responses were more general in nature or outside the scope of this planning effort. However, every effort has been made to incorporate these sentiments into the most appropriate category below.

Most commenters expressed an interest in preserving a wide range of cultural resources at Isle Royale, though several commenters favored certain themes or types of resources over others and some thought that all cultural resources should be treated equally. There were a variety of opinions about how such stewardship should be undertaken, including strongly differing opinions about the appropriateness of using partnerships for the stewardship of cultural resources. Likewise, there were markedly differing opinions about the treatment of cultural resources, most notably structures, in wilderness, with some advocating the preservation of all structures in wilderness, some opposed to the preservation of structures in wilderness, and some expressing opinions between these two extremes. There was generally support for increased ethnographic inventory work, though some concerns were expressed about the work done to date to identify traditionally associated people. There were parallel divergent opinions about the appropriateness of continuing private use and occupancy of recreational cottages with many commenters advocating that such uses should be continued in order to preserve the structures and associated cultural traditions, while others noted that private use of public facilities should be terminated and, for those structures in wilderness and potential wilderness additions, such uses are inconsistent with legal requirements in wilderness.

COMMENT SUMMARY BY CODE

The 143 pieces of correspondence contained 725 separate comments that were subsequently assigned to a code. All comments in a single code were then analyzed together to draft a comment summary to summarize public concerns related to that topic. Due to the interconnected nature of the comments received, some themes appear in multiple comment summaries. It is important to note that public scoping is not a voting process; the development of a plan takes into consideration public input but is also guided by many factors such as applicable laws, policies, and considerations of feasibility.



Main Lodge, Crystal Cove (NPS photo).



Rock Harbor scene, circa 1920s (Farmer Collection - ISRO archives).





Archeologists at work (NPS photo).

1 Support No-Action Alternative

Comment Summary: Many commenters who commented on the no-action alternative supported the no-action alternative. Commenters said that they thought the current situation was acceptable and did not need to be changed. Some specifically mentioned that the no-action alternative is the least expensive to implement. Others specifically mentioned that the no-action alternative provides an appropriate balance between various cultural resource types and/or wilderness values.

2 Oppose No-Action Alternative

Comment Summary: Some commenters specifically opposed the no-action alternative citing the need to take a proactive and/or strategic approach to cultural resource stewardship. A few comments specifically mentioned concern about the long-term stewardship of cultural resources and the ability to fulfill agency responsibilities in the absence of a plan. Some concern was also expressed that the agency currently lacks the funds necessary to steward its cultural resources and thus a plan is needed to set priorities and engage partners.

3 Support Alternative A

Comment Summary: Many commenters who commented on alternative A cited support for alternative A because they feel it most appropriately addresses cultural resources in the context of wilderness. These comments specifically endorsed the concept of documenting and then allowing natural deterioration of structures in wilderness and potential wilderness additions, or active removal of those structures after documentation. These commenters generally feel that the predominate value and/or legal mandate is to preserve the park's wilderness character even at the expense of specific cultural resources. Some commenters expressed support of alternative A as a fiscally responsible alternative that narrowly prioritizes the use of limited funding for the preservation of the park's most important cultural resources. Commenters also expressed their support of documentation and interpretation as viable treatments for cultural resources, particularly in wilderness and potential wilderness additions.

4 Oppose Alternative A

Comment Summary: Commenters who commented within this topic generally oppose alternative A because it does not do enough to protect and preserve important cultural resources and values. There are specific concerns from some commenters that wilderness is given too much consideration or is being interpreted in ways that are detrimental to cultural resources in wilderness and potential wilderness additions. There were a few comments that specifically highlighted the concern that alternative A doesn't do enough to promote partnerships, rather than traditional NPS funding sources, to provide for the preservation of cultural resources.

5 Support Alternative B

Comment Summary: Many commenters who commented on alternative B expressed support for the comprehensive perspective of alternative B in that all cultural resource themes are included, rather than specific focus areas. Commenters also expressed support for partnership arrangements that would preserve and interpret cultural resources.





Copper knife (NPS photo).

6 Oppose Alternative B

Comment Summary: Commenters who opposed alternative B expressed concerns that the broad scope of alternative B attempts to do “too much,” resulting in impacts on wilderness and insufficient organizational capacity to carry out the work. There were also specific concerns expressed about the opportunities for partnerships for historic preservation, including specific concerns that such arrangements may be administratively cumbersome, and concerns about the quality of work that might be accomplished by partners. There was also concern that over-reliance on partnerships to carry out the core mission of the National Park Service is inappropriate.

7 Support Alternative C

Comment Summary: Commenters who expressed support of the maritime focus of alternative C in general often highlighted the relationship between the maritime environment and human use, past and present. Several commenters specifically expressed support for the lighthouse keeper overnight-use opportunity and some also supported overnight visitor use in other cabins around the island.

8 Oppose Alternative C

Comment Summary: Commenters opposing alternative C expressed concern that the alternative is too narrowly focused on maritime resources to the detriment of other cultural resource themes. There were also concerns that some of the actions proposed are too tourist-focused and are not appropriate in a wilderness park. A few comments specifically opposed the use of partnerships in fulfilling the NPS cultural resource stewardship responsibilities.

9 Support Alternative D

Comment Summary: Commenters on alternative D supported the focus on archeological resources, and most notably, the engagement with tribal communities. Some commenters specifically supported the improved interpretation of archeological resources. Some commenters also specifically supported research partnerships to carry out this alternative. A few commenters expressed support of this alternative due to the relatively low cost compared to other alternatives.

10 Oppose Alternative D

Comment Summary: Commenters who opposed alternative D expressed concern that alternative D is too narrowly focused on archeological resources and pre-history to the detriment of other important cultural resources themes. There were specific concerns that the emphasis on archeological investigations and potential for removal of artifacts to museums would negatively impact the visitor experience. There was also a concern about over-reliance on partnerships to fulfill the agency’s cultural resource stewardship responsibilities.

11 Actions Common to All – General

Comment Summary: Most commenters who commented on the “Actions Common to All Preliminary Alternative Concepts” were opposed to the construct of the preliminary alternative concepts to focus on specific aspects of cultural heritage, and many advocated that all cultural resources should be preserved with no emphasis placed on any one theme, often citing various policy statements or professional opinions in support of this inclusive approach to cultural resource stewardship. There were a few commenters who felt the themed concepts were very workable and represented a reasonable range of alternatives to be considered. One commenter supported all of the actions common to all alternatives as described in the newsletter. One commenter expressed concern that the articulation of preliminary alternative concepts was premature until the park foundation document is released, and another commenter thought the description of the preliminary alternative concepts as alternatives was misleading.





How Cottage, Tobin Harbor (NPS photo).

12 Actions Common to All – Wilderness

Comment Summary: There were a few comments in support of the action common to all alternatives to terminate private use of publicly owned cabins/ cottages in compliance with existing agreements and in preservation of the park’s wilderness resources. There was also support for the documentation of cultural resources in wilderness and subsequent removal or loss through natural deterioration.

13 Actions Common to All – Treatments for Cultural Resources

Comment Summary: A few commenters expressed support of the action common to all alternatives to increase inventory, documentation, and protection of cultural resources, with one commenter suggesting that improved tribal consultation should also be considered. There was one commenter who expressed concern that allowing structures to deteriorate or be removed is part of all preliminary alternative concepts but was not identified in the treatment of cultural resources section.

14 Actions Common to All – Inventory of Ethnographic Resources

Comment Summary: Several commenters supported efforts to increase ethnographic inventory, one commenter noting that this is a time-sensitive need as many of the generation that pre-dates NPS management of Isle Royale are approaching the end of their lives and opportunities to collect their information will be lost. One commenter felt that the traditionally associated people as currently defined is too narrow and the National Park Service should specifically include the recreational cabin users in their efforts.

15 Actions Common to All – Private Residential Use of Cabins

Comment Summary: Most commenters who commented on the “Actions Common to All Preliminary Alternative Concepts: Private Residential Use of Cabins” supported the termination of private use and occupancy of recreational cabins as described in the actions common to all alternatives. Several commenters observed that such termination is both required and appropriate given that the land and associated structures are public resources, not private holdings, and the various administrative instruments used to extend such uses beyond their original termination dates have been overextended. Some commenters expressed opposing viewpoints that the termination of private use and occupancy of recreational cabins is unlawful or against policy or would deprive those families of their longstanding traditions and associations with Isle Royale. There were a few comments that termination of residential use and occupancy agreements would jeopardize the preservation of those structures and associated features.

16 Folk and Commercial Fisheries

Comment Summary: Many commenters who commented regarding folk and commercial fisheries valued the experience of learning about the lifeways of previous fisher families of Isle Royal through the historic fisheries. Several comments specifically expressed appreciation of interpretive opportunities at Edisen and some suggested additional sites where such opportunities might be offered. There were a few comments that specifically expressed an interest in retaining docks in good repair such that the fishery sites would still be safely accessible by boat for self-guided explorations and/or safe havens from storms. There were a couple comments about continuing or enhancing commercial fishing opportunities in Isle Royale waters for economic purposes.





Minong Resort, circa 1920s (Frank Warren Collection - ISRO archives).

17 Aboriginal Use

Comment Summary: Several commenters expressed support for increased emphasis on pre-history at Isle Royale, with specific support mentioned for archeological investigations, increased interpretation, and increased tribal involvement in researching and telling the stories of native peoples' use of Isle Royale. A few commenters highlighted that the aboriginal copper mines and their associated influence on regional trade networks is a compelling story of national importance, in contrast to the more recent history of logging, mining, fishing, and recreational cabin use which lacks distinction from many other locations in the region.

18 Generally Support Preservation of Cultural Resources

Comment Summary: Many commenters who generally commented on the preservation of cultural resources expressed an interest in preserving all remnants of cultural history, particularly structures. In contrast, some commenters supported the active retention/preservation of representative examples of Isle Royale structures with the rest being allowed to naturally deteriorate. Several comments specifically oppose past or future removal of deteriorated structures, some of these advocated for stabilization of specific remaining sites while others don't want any more structures to be allowed to deteriorate. One commenter specifically mentioned the importance of preserving cultural landscapes to provide context for understanding human history on Isle Royale.

19 Mining: Prehistoric and/or Historic

Comment Summary: Several commenters expressed an interest in protecting the remnants of both prehistoric and historic mine sites; however there were opposing opinions expressed regarding whether such sites should be actively preserved and interpreted or left to the forces of nature as opportunities for self-directed discovery. There were several opinions that the park's prehistoric copper mining is the most or one of the most compelling cultural resources in the park, and the commenters supported using the CRMP planning process to better focus stewardship on that history.

20 Generally Oppose Preservation of Cultural Resources

Comment Summary: Several commenters expressed opposition to preserving cultural resources, in particular structures in remote locations. Some commenters said the island should be allowed to become more natural over time without active preservation of modern human uses/resources. One commenter suggested that cultural resources should be documented pictorially and then allowed to naturally deteriorate. One commenter suggested preserving a few representative examples of structures and allowing the rest to deteriorate.

21 Museum Objects

Comment Summary: A couple comments expressed concern that artifacts and historic objects be preserved and made accessible to the public. There was specific concern that historic furniture is being stored in a deteriorated building at Amygdaloid Island and that curation of museum objects in distant locations makes them inaccessible to visitors. There was a suggestion that a museum be developed on the island or in Houghton, Michigan, where those museum objects might be made available for public appreciation.



22 Recreational Cottages

Comment Summary: Commenters who commented regarding recreational cottages expressed support for the preservation of either a representative sample or all of the recreational cottages on Isle Royale. They feel that the cottages should be preserved because they tell the rich history of the vacationing families at Isle Royale. Some commenters identified specific cottages that they felt most important to preserve (e.g., Rock Harbor Lodge, Main Lodge in Crystal Cove, cabins at Tobin Harbor, etc.)

23 Recreational Cabins – Let Families Stay Under Permit/Lease

Comment Summary: Some commenters suggested that those original occupants and their descendants who have had life leases, special use permits, or Volunteer in Park permits for the use of recreational cottages should continue to be able to stay in those cottages under continued permits or leases. These commenters felt that those residents represent an important cultural resource at the island and their continued use of the cottages should be preserved.

24 Recreational cabins: Let Families Stay Providing They Do Maintenance/Interpretation

Comment Summary: Some commenters suggested that those original occupants and their descendants who have had life leases, special use permits, or Volunteer in Park permits for the use of recreational cottages should continue to be able to stay in those cottages, providing that they do maintenance and/or interpretation of the cottages. Some commenters pointed to the potential cost savings to the National Park Service from the transferring of maintenance responsibilities to private individuals. These commenters also believe that by allowing private individuals continued use of the cottages, visitors to the island will have a richer experience through interactions and education by the private individuals. Certain regulations regarding care of the cottages may be instituted (e.g., maintain the property in an environmentally benign manner, limit modifications of historic architecture, tours of cottages will be conducted).



Breen/Snell cottage, Tobin Harbor (NPS photo).

25 Recreational Cabins – Let Families and Friends Use Cabins

Comment Summary: A handful of commenters suggested that those original occupants and their descendants who have had life leases, special use permits, or Volunteer in Park permits for the use of recreational cottages should continue to be able to stay in those cottages, without the legal guidance of continued permits or leases.

26 Recreational Cabins – Don't Let Families Stay After Leases Expire

Comment Summary: A handful of commenters expressed support for the discontinuation of existing life lease extensions, special use permits, and Volunteer in Park permits for the private use of recreational cottages. They agreed that it is appropriate for the National Park Service to end those agreements upon expiration, and that special exceptions should not be made.

27 Recreational Cabins – Allow Cabin Use By Others – Non-Life Leasees (Concessioners, Artists In Residence, Renters for a Weekend, etc.)

Comment Summary: Several commenters suggested that upon expiration of life lease extensions, special use permits, and Volunteer in Park agreements for the private use of recreational cottages, the cottages should be rented to park visitors as a mechanism to generate revenue for the park and continued preservation of the cottages. This also would help interpret the recreational cottages to those who have been unable to participate in such an experience while the cottages were still privately occupied.





Wreck of GEORGE M. COX, 1933
(Robert E. Johns Collection - ISRO archives).



Edisen Fishery (NPS photo).

28 Maritime: Vernacular Boats, Shipwrecks, Lighthouses, and Navigational Aids

Comment Summary: Many commenters who commented regarding the maritime resources of the park expressed appreciation of the park's maritime heritage and supported concepts that emphasized that heritage or made it more accessible to park visitors. In particular there was a lot of interest in lighthouses and support around the concepts of a lightkeeper-in-residence program and/or opportunities for park visitors to stay overnight in light stations. One commenter stated that preservation of lighthouses is largely a waste of time and effort and should not be continued. There was also general interest in preserving ship wrecks and in the opportunity to explore those shipwrecks through various means, including dive opportunities. There were a few comments about repair/disrepair of various docks used by visitors accessing the park by private boat and one comment about the lack of availability and high cost of boat fuel on the island. There was one suggestion specifically to interpret the heritage of boats, particularly NPS boats.

29 Civilian Conservation Corps and Mission 66

Comment Summary: A few commenters expressed support for including Civilian Conservation Corps (CCC) related resources in the Cultural Resources Management Plan, and one commenter expressed concern that the existing preliminary alternative concepts seems to exclude CCC properties.

30 Recreational Summer Cabin Families

Comment Summary: Commenters who commented within this topic expressed concern that the preliminary alternative concepts as presented fail to encompass the historic affiliations of specific families that continue through this day in association with recreational summer cabin use and occupancy. There were a number of concerns that the recent analysis of traditionally associated people is incomplete or the process flawed and several suggested remedies to include external review or validation with specific recommendations of who should be engaged during that process. Commenters also presented differing opinions about the criteria to be used and differing interpretations of NPS policy and process regarding ethnographic studies.

31 Miscellaneous Historic Activities

Comment Summary: Commenters expressed a wide range of thoughts and ideas related to historic activities/resources. One comment asked that Mt. Ojibway fire tower be kept, while another commenter suggested removal of all three fire towers. One commenter suggested preservation and documentation of the wireless telegraph tower on Washington Island as a rare example of that technology. Nonspecific comments were offered on the diesel generator on West Caribou Island and the logging camps.

32 Cemeteries

Comment Summary: One commenter expressed appreciation for the experience of visiting Cemetery Island, specifically noting support for the maintenance but not restoration of this site.



33 Commercial Services

Comment Summary: Several commenters suggested that fire towers and cabins/cottages could be rented out as a commercial venture, allowing the public to experience these places first hand, and generating revenue for their upkeep. One suggestion was made to offer canoe rental and another suggestion to offer glass-bottom boat tours. One commenter suggested the production of a printed, detailed, guide for self-directed discovery for a fee and expressed dislike for the large tour groups observed in the park. One commenter suggested a lodge as a commercial accommodation for park visitors.

34 Interpretation and Education – Interpretation of Cultural Resources

Comment Summary: Many commenters expressed an interest in seeing more or improved interpretation and educational opportunities focused on themes of cultural resources or the interplay between people and nature on Isle Royale. There were specific suggestions for development of both on-site and off-site interpretation, including several comments suggesting the development of apps and use of technology for self-directed learning opportunities as well as on-site “field schools” and “ranger walks/talks” of various types. There was also an interest voiced by a few commenters in providing opportunities for visitors to interact with Isle Royale summer residents to learn about and gain appreciation for island lifeways.

35 Interpretation and Education – Limit (Or Avoid) On-Site Interpretation in order to Preserve Self-Directed Exploration

Comment Summary: A few commenters specifically opposed the concepts of hosting field schools and offering interpretive demonstrations, expressing their concern that such “intensive” approaches to interpretation detract from Isle Royale as a place for reflection, solitude, and low-key experiences. There were a few comments that expressed support for passive interpretation, allowing self-discovery with limited supports (such as a photo directory of cultural sites) to help visitors explore history on their own terms.

36 Entirely New Alternatives

Comment Summary: Many commenters responded to the topic question regarding new or different alternatives and suggested combinations of the preliminary alternative concepts presented and virtually every possible combination was endorsed by at least one commenter. Most commonly, a combination of alternatives B, C, and D was suggested. There were also specific comments that proactively engaging diverse partnerships, as described in alternative B, should be incorporated into every alternative because the National Park Service alone lacks the funds necessary to carry out all of the work described. There were a few comments that specifically asked that every aspect of every cultural resource type and theme be systematically inventoried and actively preserved coupled with concern that time will reduce opportunities for preservation, suggesting that there is no need to focus the CRMP but rather “save it all now.”

37 Identification of Specific Resources or Sites to Preserve

Comment Summary: There were several comments that addressed specific resources or sites other than those not elaborated upon in the general cultural resources categories. One commenter implored the National Park Service to keep the wolf/moose research station at Bangsund Cabin in compliance with long-standing agreements. One commenter asked that the single historic cabin at Belle Isle be preserved. One commenter values the use of screen shelters at Grace and Beaver and suggested they be added to Thompson and Johns islands but asked that they not be added to Washington or Barnum islands in order to preserve the historic buildings at those locations. One commenter suggested keeping Adirondack shelters throughout the park.





AMERICA at Rock Harbor, circa 1920s.
(Frank Warren Collection - ISRO archives)



John Linklater and Tchi-ki-wis camping, circa 1920s
(Frank Warren Collection).

38 Planning – General Comments Regarding Planning Efforts (CRMP and Others)

Comment Summary: Commenters expressed a wide range of opinions about the planning effort. Specifically, one commenter suggested that the wilderness and backcountry planning effort (WBMP) and the cultural resources management planning (CRMP) effort must be kept separate and expressed concern that alternative A was inappropriately included in the CRMP. Another commenter highlighted the geographic interplay between wilderness and cultural resources and suggested that they might be more effectively addressed in a combined effort. One comment suggested that the National Park Service approach Congress to remove wilderness designation in areas where cultural resources are located. A few commenters expressed myriad concerns that the planning process to date was flawed by lack of or biased ethnographic information, lack of sincerity in public engagement, poor planning of public meetings, and incomplete/inconsistent descriptions of preliminary alternative concepts. Similarly there were opposing views regarding funding and the use of partnerships to steward cultural resources, some suggesting that such partnerships are ill-advised and others advocating for them in order to increase organization capacity to accomplish needed work. There were also concerns that funding considerations were not consistently included in the description of alternatives and should be paramount in the planning process. One commenter suggested that alternatives be crafted around the allocation of funds between research, preservation, and interpretation. And, finally, one commenter suggested maps be made available to better describe where cultural resources are located in relationship to wilderness boundaries.

39 Planning – Oppose CRMP Planning Effort in General

Comment Summary: One commenter expressed concern that a Cultural Resources Management Plan is an unwise use of time and money that could be better used to repair existing facilities.

40 Planning – Concern Over Planning Process

Comment Summary: There were a number of comments that expressed concern over the planning process, specifically that the process is too long, written communication is unclear, more lead time is needed for public engagement opportunities, consulting parties to be included outside of public events and to have a more substantial role in alternative development, and need for tribal involvement. There was also concern that the preliminary alternative concepts were based on an incomplete analysis of ethnographic information regarding traditionally associated people.

41 Partnerships – Develop Partnerships (Families, School Groups, Research Centers, etc.)

Comment Summary: Commenters expressed support for a wide variety of formal and informal partnership arrangements that currently exist and support the idea of expanded partnership opportunities in the future related to cultural resource stewardship. It was noted by several commenters that outside funding as well as the donation of time and money would be needed to implement a cultural resources management plan, with some alternatives needing more support than others.



42 Partnerships – Oppose Partnerships

Comment Summary: Several commenters expressed opposition to the concept of increasing partnerships in cultural resources management. Specific concerns expressed include private sponsorship of public resources, misplaced priorities based on biases of partners, and administrative complications/burdens to establish and maintain such partnerships. One comment specifically opposed adaptive compatible re-use of structures by partners as inconsistent with the concept of a wilderness park.

43 Wilderness – Wilderness Is Important

Comment Summary: Commenters who mentioned wilderness generally expressed support for the wilderness experience opportunities afforded by Isle Royale, namely camping, hiking, and kayaking. Many comments reflected the relative scarcity of wilderness in the eastern United States and appreciation of the opportunities it affords for connection to nature and spiritual renewal. Several commenters specifically commented on the legal requirements for the preservation of wilderness character and expressed that cultural resource considerations should be subordinate to those legal requirements.

44 Wilderness – No Need for Additional Wilderness (Cabins Are Fine, Cabin Area Nominal, etc.)

Comment Summary: Several commenters expressed concern that the areas where cabin sites are located should be excluded from wilderness through an act of Congress. There were generally comments that expressed concern about the legitimacy of the designated wilderness and potential wilderness additions given the long history of human use and occupation of the island and the material remains of that use.

45 Wilderness – Balance Necessary Between Cultural Resources and Wilderness

Comment Summary: Commenters mentioning wilderness often expressed the need to find a workable balance between cultural resources stewardship and preservation of wilderness character. Some specific commenters placed emphasis on preservation of wilderness over cultural resources, and vice versa, often citing a legal basis for their interpretation.

46 Wilderness – Private Use of Structures in Wilderness Impacts Wilderness

Comment Summary: One comment expressed concern that if/when use of structures in wilderness is terminated, that the National Park Service find ways to support the ongoing research operations that currently take place at those locations, noting the value of long-term research.

47 Wilderness – Structures in Wilderness (Not the Use, Just the Structures [Including Fire Towers, Cabins, Fisheries, Ranger Station, Research Station])

Comment Summary: Several commenters expressed an interest in retaining at least some structures in wilderness as opportunities to enhance the visitor experience and one person commented that finding an abandoned home site in Isle Royale Wilderness was a positive experience. A few comments focus on the need to preserve a representative sample of structures, based on differing considerations about how that decision would be made, and not all structures in wilderness; on a related note, some commenters added restrictions to the types of tools that might be employed in their preservation. A few commenters expressed the opinion that all structures must be preserved, even those in wilderness.



Hammerstones at Minong Mine, circa 1892
(William H. Holmes Collection - Smithsonian).



SOURCE DATA

All correspondence received by December 10, 2013, was considered in this comment analysis, though a few pieces of additional correspondence were received after that date.

NEXT STEPS

Completing the Cultural Resources Management Plan will require ongoing consultation and coordination with the many entities involved in planning and implementation. Therefore, this planning process has and will continue to emphasize open and inclusive communication to engage the public and understand their desires and concerns. See the graphic below for an overall timeline for this process.

Following the conclusion of this public comment period, NPS staff will use the input gathered to carefully develop alternatives and prepare draft cultural resources management plan / environmental impact statement. As planning continues, the planning website will continue to be updated. To see these updates and to find more information on the project, please see <http://parkplanning.nps.gov/ISROcrmp> or www.nps.gov/ISRO. The public will also be notified through a number of different means when the draft cultural resources management plan is available for public review. The National Park Service expects this public review process to begin late 2014. Please stay tuned!



ALGOMA Helm (NPS photo).

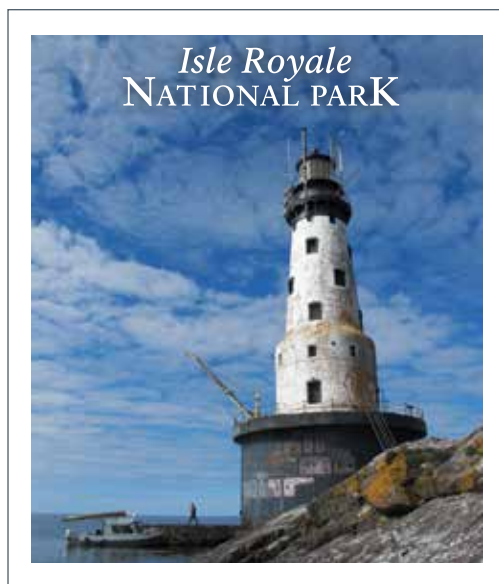


Johns Hotel Restoration, Barnum Island (NPS photo)

Project Schedule

Planning Activity	Approximate Time Frame	Public Involvement Opportunities
Develop alternatives and prepare draft cultural resources management plan / environmental impact statement.	Late 2013–Fall 2014	
Release draft cultural resources management plan / environmental impact statement to the public.	Late 2014	Review document and voice your ideas and concerns.
Review and analyze public comments, and revise draft document.	Mid to late 2015	
Implementation of approved plan.	2016 and beyond	Work with park staff to implement the approved plan.





Cultural Resources Management Plan
Public Comment Summary Report